

David B. Levant, WSBA # 20528
STOEL RIVES LLP
600 University Street
Suite 3600
Seattle, WA 98101
Telephone (206) 624-0900
Fax (206) 386-7500
dblevant@stoel.com
Attorneys for ENTEK International LLC

Hearing Date: February 9, 2006, 10:00 a.m.
Objection Deadline: February 2, 2006, 4:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|----------------------------|---|------------------------|
| In re: |) | Chapter 11 |
| |) | |
| DELPHI CORPORATION, et al. |) | Case No. 05-44481 |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**NOTICE OF MOTION OF ENTEK INTERNATIONAL LLC (i) TO ALLOW
RECOUPMENT AND/OR (ii) FOR RELIEF FROM THE AUTOMATIC STAY TO
ALLOW SET OFF**

PLEASE TAKE NOTICE that on December 28, 2005, ENTEK International LLC (“ENTEK”), by its undersigned counsel, filed a MOTION (i) TO ALLOW RECOUPMENT AND/OR (ii) FOR RELIEF FROM THE AUTOMATIC STAY TO ALLOW SET OFF (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on February 9, 2006, at 10:00 a.m. (Prevailing Eastern Time) (the “Hearing”) before the Honorable Robert D. Drain, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Case Management Order

entered by the Court in these cases (Docket No. 245), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, and (e) be served upon the undersigned counsel David B. Levant, Stoel Rives LLP, 600 University Street, Suite 3600, Seattle, WA 98101, so as to be **received** no later than **4:00 p.m. (Prevailing Eastern Time) on February 2, 2006** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein and in the Case Management Order, the Bankruptcy Court may enter an order granting the motion without further notice.

DATED: December 28, 2005. STOEL RIVES LLP

/s/ David B. Levant
David B. Levant, WSBA # 20528
Brandy A. Sargent, OSB No. 04571
Stoel Rives LLP
600 University Street
Suite 3600
Seattle, WA 98101
Telephone (206) 624-0900
Fax (206) 386-7500
dbelevant@stoel.com

Attorneys For ENTEK International LLC